



REYNOLDS METALS COMPANY

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May 6, 2005
166034.06.06.05

Chip Humphrey
Remedial Project Manager
United States Environmental Protection Agency
Oregon Operations Office
811 S.W. 6th Avenue
Portland, Oregon 97204

Subject: Company Lake Early Remedial Action 2004 and Early 2005 Interim Report

Dear Mr. Humphrey:

This letter constitutes the interim report for early remedial actions taken in 2004 and early 2005 at the Company Lake site at the Reynolds Metals Company/Alcoa (RMC/Alcoa) facility in Troutdale, Oregon. The work was conducted in accordance with the following documents; U.S. Environmental Protection Agency's (EPA) *Unilateral Administrative Order for Remedial Design and Remedial Action* (2003); *Record of Decision for Interim Remedial Action* (2002); *Scope of Work for Early Remedial Action Reynolds Metals Superfund Site* (2003); and CH2M HILL's *Memorandum WP No. 55: Company Lake Early Remedial Action Work Plan* (May 12, 2003).

Actions conducted in 2004 and early 2005 are documented in this interim report and include excavation of process residue (PR), confirmation sampling, offsite transport and disposal of the excavated material, and site restoration activities.

Actions taken prior to 2004 include the 2001 pilot test to determine the feasibility of dewatering and removing PR and underlying soil documented in the *Company Lake Early Action Report* (CH2M HILL, March 2002), the 2002 bypass pipeline and dewatering system project documented in the *Company Lake Bypass Pipeline and Dewatering System Installation* (CH2M HILL, April 2003), and the removal of PR in 2003 documented in the *Company Lake Early Remedial Action Interim Report* (CH2M HILL, April 2004).

A final report will be prepared documenting outstanding actions which includes the installation of a soil or rock cap approximately 150 foot long at the base of the north side of the COE dike. This work is planned for the Summer/Fall 2005. The final report will include a summary of historical analytical data, a summary of removal activities, confirmation sample tables, photo logs, risk estimates, manifests, data validation reports, final project costs, and certification.

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Approximately 30,948 tons of process residue and underlying soil were removed from Company Lake between August 31, 2004 and December 22, 2004. Figure 1 shows the areas excavated during this time. During excavation, the PR removed had a water content greater than transport levels allow. Additives including paper mill clarifier solids acquired through the Wasco County Landfill and waste soil from the South Landfill removal action were trucked to Company Lake and mixed with the PR to stabilize the PR for transportation and disposal. Once the waste was stabilized, it was transported offsite for disposal. Once the supply of waste soil at South Landfill was exhausted, soil from Scrap Yard was trucked to Company Lake, mixed with the PR, and then placed in trucks and disposed offsite. In September 2004, PR from Company Lake was trucked to the south Scrap Yard and placed on waste soils to dry. Once dry, the material was disposed offsite. All of the waste material removed during 2004 was disposed at Wasco County Landfill.

Confirmation soil samples were collected from areas where PR was removed after excavation activities were complete. In 2004, thirteen confirmation soil samples plus one duplicate were collected from the excavation area. Confirmation soil samples were analyzed for total fluoride and polynuclear aromatic hydrocarbons (PAHs) in accordance with CH2M HILL's Memorandum No. 23, *Company Lake Field Sampling Plan, RMC-Troutdale* (CH2M HILL, August 11, 2003). Soil samples were collected from a depth interval of 0 to 6 inches below final excavation limits (sample locations and excavations areas are shown on Figure 1). Sample results are summarized in Table 1.

Also in 2004, five composite soil samples were taken from loadout areas where excavated material was temporarily placed prior to being loaded into trucks. Each composite sample consisted of three surface soil samples taken in the loadout area. In February 2005, a second confirmation sample was taken in the area of the 2001 pilot removal, at sample location CL-SS0004. In 2003 a second removal effort was initiated along the south shore of the pilot removal area to improve cleanup in this area, but confirmation samples were not collected at that time. All confirmation soil samples have met cleanup goals.

Disturbed soil areas above 12 foot elevation were restored by grading, placing jute matt over steep slopes and seeding with a mixture of wetland grasses.

EPA oversight activities during 2004 were provided by Mr. John Howland from Parametrix.

Sincerely,
Reynolds Metals Company



Steven M. Shaw
Remediation Project Manager

c: Mavis Kent/Oregon DEQ
Mark Stiffler/Alcoa
Scott Dethloff/CH2M HILL

15-Apr-2005

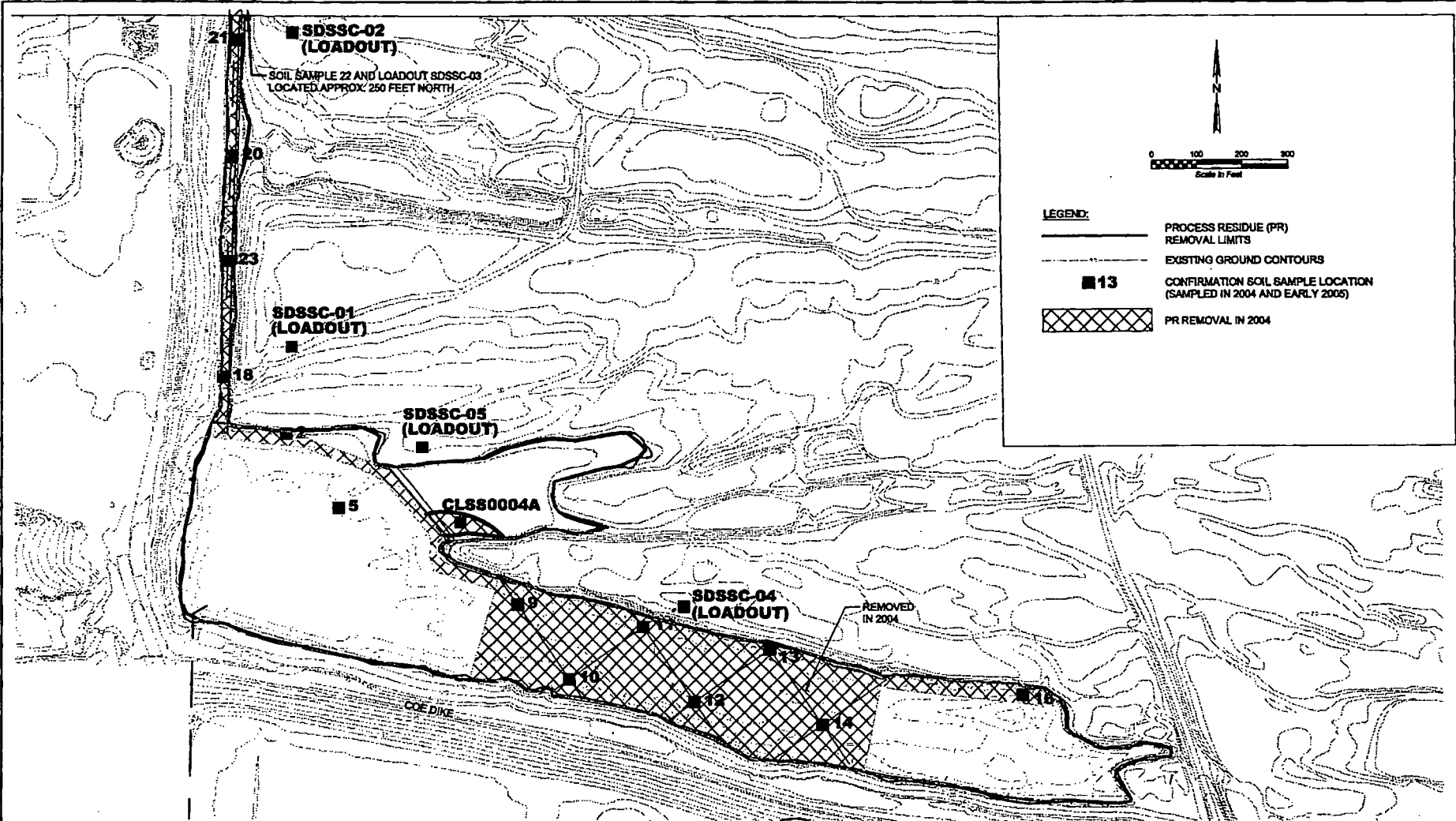


Figure 1
CONFIRMATION SAMPLE LOCATIONS
REYNOLDS METALS COMPANY/ALCOA, INC.
TROUTDALE, OREGON
2004 Interim Report
Company Lake Remedial Action

CH2MHILL

Table 1
Company Lake Confirmation Soil Sample Results - 2004 and Early 2005
Reynolds Metals Company/Alcoa, Inc., Troutdale, Oregon

Sample ID	Date Sampled	Fluoride by 340.2 Mod	Acenaphthene	Acenaphthylene	Anthracene	Benzo (a) anthracene	Benzo (a) pyrene	Benzo (b) fluoranthene	Benzo (ghi) perylene	Benzo (k) fluoranthene	Chrysene	Dibenzo (a,h) anthracene	Fluoranthene	Fluorene	Indeno (1,2,3-cd) pyrene	Naphthalene	Phenanthrene	Pyrene	Total PAHs
CLSC-02-000-122004-0	12/20/04	784	0.00344 U	0.00344 U	0.00344 U	0.0141	0.0177	0.0237	0.0288	0.0159	0.0278	0.00648	0.0153	0.00344 U	0.0232	0.00344 U	0.0052	0.0151	0.19
CLSC-05-000-122004-0	12/20/04	260	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.00378 U	0.0038 U
CLSC-08-000-122004-0	12/20/04	995	0.013	0.00268 U	0.0322	0.291 D	0.451 D	0.822 D	0.593 D	0.452 D	0.577 D	0.136	0.307 D	0.00822	0.487 D	0.00348	0.0877	0.285 D	4.35
CLSC10-0000-0922040	09/22/04	368	0.0019 J	0.0069 U	0.0069 U	0.005 J	0.0069 U	0.011	0.0043 J	0.0032 J	0.011	0.011	0.003 J	0.0013 J	0.015	0.0069 U	0.0069 U	0.0028 J	0.069
CLSC11-0000-121304-0	12/13/04	493	0.0228	0.00333 U	0.0336	0.158	0.163	0.138	0.129	0.128	0.199	0.0365	0.201	0.0136	0.112	0.00796	0.108	0.19	1.64
CLSC12-0005-111104-0	11/11/04	150 U	0.00354 U	0.00354 U	0.00354 U	0.0238	0.0244	0.0342	0.024	0.0202	0.0518	0.007	0.0278	0.00354 U	0.0191	0.00354 U	0.00855	0.0243	0.26
CLSC12-0005-111104-1	11/11/04	150 U	0.00319 U	0.00319 U	0.00319 U	0.0197	0.0207	0.0285	0.0187	0.0185	0.0404	0.00521	0.0241	0.00319 U	0.015	0.00319 U	0.00751	0.0214	0.22
CLSC13-0000-121304-0	12/13/04	150 U	0.00313 U	0.00313 U	0.00313 U	0.00688	0.00773	0.00828	0.00848	0.00878	0.0092	0.00313 U	0.0113	0.00313 U	0.00541	0.00313 U	0.00449	0.0103	0.077
CLSC14-0000-0920040	09/20/04	857	0.1 U	0.1 U	0.034 J	0.032 J	0.14	0.088 J	0.067 J	0.063 J	0.048 J	0.16	0.081 J	0.1 U	0.2	0.1 U	0.031 J	0.052 J	0.97
CLSC-18-000-122004-0	12/20/04	395	0.00532	0.00297 U	0.0087	0.0543	0.0604	0.0627	0.0463	0.0448	0.0786	0.013	0.0669	0.00297 U	0.0399	0.00297 U	0.0345	0.0664	0.58
CLSC18-0000-121304-0	12/13/04	342	0.00377 U	0.00377 U	0.00377 U	0.0113	0.0152	0.0272	0.0187	0.0153	0.0254	0.0054	0.0161	0.00377 U	0.0148	0.00377 U	0.00377 U	0.0124	0.16
CLSC20-0000-121304-0	12/13/04	289	0.00337 U	0.00337 U	0.00337 U	0.00403	0.00575	0.0119	0.00696	0.00717	0.0104	0.00337 U	0.0035	0.00337 U	0.00523	0.00337 U	0.00337 U	0.00337 U	0.055
CLSC21-0000-121304-0	12/13/04	336	0.00382 U	0.00382 U	0.0039	0.0296	0.042	0.0701	0.0422	0.0427	0.0896	0.0099	0.0514	0.00382 U	0.0338	0.00382 U	0.00492	0.0323	0.45
CLSC22-0000-121404-0	12/14/04	893	0.0781 U	0.0781 U	0.135	1.02	1.13	1.91	1.8	0.961	3.75	0.608	0.268	0.0781 U	1.59	0.0781 U	0.1080	0.225	13.50
CLSC23-000-122104-0	12/21/04	218	0.00371 U	0.00371 U	0.00575	0.0431	0.0814	0.104	0.0813	0.0494	0.128	0.0208	0.0238	0.00371 U	0.069	0.00371 U	0.0089	0.0224	0.62
SDSSC-01-00-122004-0	12/20/04	380	0.00323 U	0.00323 U	0.0219	0.254 D	0.215	0.468 D	0.158	0.185	0.702 D	0.0487	0.118	0.00323 U	0.13	0.00323 U	0.0202	0.104	2.42
SDSSC-02-00-122004-0	12/20/04	324	0.00352 U	0.00352 U	0.0688	0.801 D	0.788 D	1.3 D	0.543 D	0.561 D	2.05 D	0.153	0.47 D	0.00352 U	0.449 D	0.00352 U	0.0463	0.382 D	7.81
SDSSC-03-00-122004-0	12/20/04	322	0.028	0.0047	0.0748	0.684 D	0.805 D	1.09 D	0.609 D	0.521 D	1.53 D	0.169	0.588 D	0.0176	0.5 D	0.00417	0.1540	0.557 D	7.35
SDSSC-04-00-122004-0	12/20/04	150 U	0.00302 U	0.00302 U	0.00302 U	0.00442	0.00389	0.0051	0.00302 U	0.00348	0.00782	0.00302 U	0.00475	0.00302 U	0.00302 U	0.00302 U	0.00302 U	0.0045	0.034
SDS-SC05-00-122104-0	12/21/04	639	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.00408 U	0.0041 U
CL650004A	02/16/05	280	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.00359 U	0.0038 U

Notes:
D = This qualifier is used for all compounds identified in an analysis at a secondary dilution factor.
J = Indicates an estimated value.
U = Indicates the compounds was analyzed for but not detected.